

February 28, 2011

VIA ECFS

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2010(e) CPNI Certification; EB Docket 06-36  
Annual 64.2010(e) CPNI Certification for 2010  
Date filed: February 28, 2011  
Name of company covered by this certification:  
Native American Telecom, LLC – Pine Ridge  
Form 499 Filer ID: NEW  
FCC Registration Number (FRN): 0019194083  
Name of signatory: Jeff Holoubek  
Title of signatory: President

I, Jeff Holoubek, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

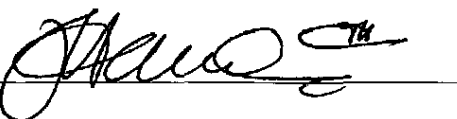
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

Native American Telecom, LLC – Pine Ridge has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

Native American Telecom, LLC – Pine Ridge has not received customer complaints in the past year concerning the unauthorized release of CPNI.

Native American Telecom, LLC – Pine Ridge represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. Native American Telecom, LLC – Pine Ridge also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: \_\_\_\_\_

  
Jeff Holoubek, President

**CPNI Compliance Statement and Operating Procedures of**  
**Native American Telecom - Pine Ridge, LLC**

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order"),<sup>1</sup> I, Jeff Holoubek, President of Native American Telecom - Pine Ridge, LLC and its affiliated entities makes the following statement:

Native American Telecom - Pine Ridge, LLC has established policies and procedures to comply with the Federal Communications Commission's (FCC) rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Native American Telecom - Pine Ridge, LLC is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize Native American Telecom - Pine Ridge, LLC's policies and procedures designed to safeguard CPNI.

Native American Telecom - Pine Ridge, LLC uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. Native American Telecom - Pine Ridge, LLC does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Native American Telecom - Pine Ridge, LLC has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Native American Telecom - Pine Ridge, LLC has established procedures to verify an incoming caller's identity. Native American Telecom - Pine Ridge, LLC trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in Native American Telecom - Pine Ridge, LLC's CPNI Manual. Native American Telecom - Pine Ridge, LLC also limits the number of employees that have access to customer information and call data.

Native American Telecom - Pine Ridge, LLC has chosen to prohibit the use or disclosure of CPNI for marketing purposes. If CPNI is to be used for Sales or

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<sup>1</sup> 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."

Marketing in the future, the required notice and opt-out approval process will be conducted as required, and safeguards will be implemented in accordance with 47 C.F.R. § 64.2009.

The carrier has established a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

Native American Telecom - Pine Ridge, LLC will provide written notice within five business days to the Commission of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.


(1) The notice shall be in the form of a letter, and shall include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.

(2) Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

Native American Telecom - Pine Ridge, LLC will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

Native American Telecom - Pine Ridge, LLC annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

  
NAME

President  
TITLE